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Attorneys for Joseph Lombardo

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DOES 1-16; and UNKNOWN NAMED DOES  
1-1000,

Case No.: 2:15-cv-01638-RFB-CWH

Plaintiffs,

vs.

ADAM PAUL LAXALT, Attorney General of  
the State of Nevada; CHRIS PERRY, Director of  
the Nevada Department of Public Safety;  
NATALIE WOOD, Chief Parole and Probation  
Division of the Nevada Department of Public  
Safety; PATRICK J. CONMAY, Chief Records  
and Technology Division of the Nevada  
Department of Public Safety; JOSEPH  
LOMBARDO, Sheriff of the Las Vegas  
Metropolitan Police Department, ALEXANDER  
PEREZ, Chief of the North Las Vegas Police  
Department; STEVEN WOLFSON, District  
Attorney of Clark County; CHIEF PATRICK  
MOERS, Henderson Police Department,

Defendants.

**STIPULATION AND ORDER TO DISMISS CERTAIN DEFENDANTS WITHOUT  
PREJUDICE**

Plaintiffs DOES -16 and Unnamed Does 1-1000 (collectively "Plaintiffs"), by and  
through their attorneys of record, Robert Draskovich, Esq., Gary A. Modafferi, Esq. and Allen  
Lichtenstein, Esq. and Defendants, Patrick E. Moers, by and through his attorneys of record,  
Henderson City Attorney's Office; Defendant Joseph Lombardo, by and through his attorneys of  
record, Nick D. Crosby, Esq. of the law firm of Marquis Aurbach Coffing; and Alexander Perez,  
by and through his attorneys of record, North Las Vegas City Attorney's Office, hereby agree  
and stipulate that all claims asserted by the Plaintiffs and against Defendants Lombardo, Moers,  
and Perez (collectively "Law Enforcement Defendants"), whether known or unknown in the

1 above-entitled action, shall be dismissed without prejudice as they relate to the Law  
2 Enforcement Defendants.

3 It is further agreed that the Plaintiffs and the Law Enforcement Defendants shall each  
4 bear their own attorneys fees and costs and shall not be subject to any award of attorneys fees,  
5 costs or damages arising from the above-entitled action.

6 It is further agreed that the Law Enforcement Defendants will be subject to and shall  
7 abide by any injunction, declaratory relief granted or order of the Nevada Supreme Court or  
8 District Court in the above-entitled action, provided, however, the Law Enforcement Defendants  
9 shall not be liable for any damages ordered in any such order, decree or judgment, including any  
10 award of attorneys fees or costs.

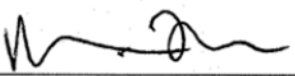
11 It is further ordered that Plaintiffs, through their counsel of record, shall immediately, or  
12 as soon as reasonably possible, notify the Law Enforcement Defendants of any order, injunction  
13 or decree or modification of any such order, injunction or decree issued in the above-captioned  
14 matter, including any order, injunction, or decree issued by the Nevada Supreme Court.

15 IT IS SO STIPULATED this \_\_\_ day of September, 2015.

16 PLAINTIFFS

HENDERSON CITY ATTORNEY'S  
OFFICE

17  
18 Robert M. Draskovich, Esq.  
19 Nevada State Bar No. 6275  
20 Gary A. Modafferi, Esq.  
21 Nevada State Bar No. 12450  
22 815 S. Casino Center Blvd.  
Las Vegas, Nevada 89101  
Attorney for Plaintiffs

17  
18   
19 Josh M. Reid, Esq.  
20 Nevada State Bar No. 7497  
21 Michael J. Oh, Esq.  
22 Nevada State Bar No. 7470  
240 Water Street, 4th Floor  
Henderson, Nevada 89015  
Attorneys for Defendant Patrick E. Moers

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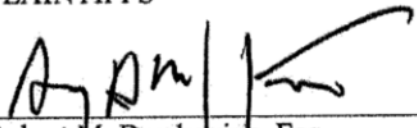
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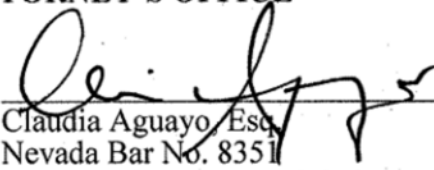
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NORTH LAS VEGAS CITY  
ATTORNEY'S OFFICE

ATTORNEY GENERAL'S OFFICE

By:

  
Claudia Aguayo, Esq.  
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North Las Vegas, NV 89030  
Attorney for Alexander Perez


By:

Kimberly A. Buchanan, Esq.  
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555 E. Washington Street, Ste. 3900  
Las Vegas, NV 89101  
Attorney for Adam Paul Laxalt,  
Attorney General; Chris Perry, Natalie  
Wood and Patrick J. Conmay, Nevada  
Department of Public Safety

**ORDER**

IT IS SO ORDERED that Defendant Joseph Lombardo, Defendant Patrick E. Moers, and Defendant Alexander Perez are hereby dismissed from United States District Court, District of Nevada, Case 15-cv-01638, without prejudice pursuant to the above stipulation.

IT IS SO ORDERED:

  
RICHARD F. BOULWARE, II  
United States District Judge  
DATED this 25th day of January, 2016.

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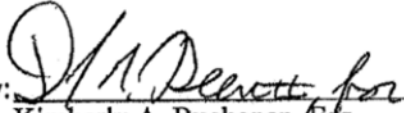
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DISTRICT COURT JUDGE

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